

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)

Case No. **3:23-md-03071**
MDL No. 3071

Chief Judge Waverly D. Crenshaw, Jr.

This Document Relates to:
3:23-cv-00412, 3:23-cv-00413, 3:23-cv742

**THE RELATED COMPANIES, L.P.'S AND RELATED MANAGEMENT COMPANY
L.P.'S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFFS' SECOND
AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

Defendants The Related Companies, L.P. (“TRCLP”), and Related Management Company L.P. (“RMC”), by and through undersigned counsel, hereby answers Plaintiffs’ Second Amended Consolidated Class Action Complaint (the “Complaint”) as follows:

GENERAL DENIALS

The headings and preamble set forth in the Complaint do not constitute substantive allegations to which a response is required; to the extent a response to them is required, TRCLP and RMC deny them. The headings set forth in the Complaint are repeated herein only for ease of reference. Except as specifically and explicitly admitted, TRCLP and RMC deny the allegations in the Complaint.

INTRODUCTION

ANSWER TO PARAGRAPH 1: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 1.

ANSWER TO PARAGRAPH 2: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, except admit that RealPage offered certain software, including LRO. TRCLP and RMC deny the allegations set forth in paragraph 2 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 3: TRCLP and RMC deny the allegations set forth in paragraph 3 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 3.

ANSWER TO PARAGRAPH 4: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding the purported statements set forth in this paragraph, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 4 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 5: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding the purported statements set forth in this paragraph, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 5 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing

documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents..

ANSWER TO PARAGRAPH 6: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 6.

ANSWER TO PARAGRAPH 7: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding the purported statements set forth in this paragraph, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 7 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 8: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 8.

II. BACKGROUND

ANSWER TO PARAGRAPH 9: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding the purported statements set forth in this paragraph, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 9. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 10: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding the purported statements set forth in this paragraph, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 10. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 11: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding the purported statements set forth in this paragraph, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 11 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC

respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 12: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 12.

ANSWER TO PARAGRAPH 13: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 13. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 14: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 14 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 15: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 15. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 16: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 16 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 17: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 17 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal

conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 18: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 18 regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 19: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 19 regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 20: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 20 regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 21: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or graphics in this paragraph, deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants, and deny the allegations set forth in paragraph 21 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 22: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or graphics in this paragraph, deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants,

and deny the allegations set forth in paragraph 22 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 23: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 23 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 24: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 24 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials,

TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 25: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 25 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 26: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 26 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 27: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 27 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third

parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 28: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 28 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 29: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 29 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or

otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 30: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 30 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 31: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 31 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 32: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 32 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 33: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 33 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal

conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 34: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or graphics referred to in this paragraph, deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 34 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 35: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 35 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 36: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 36 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 37: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 37 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 38: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 38 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal

conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 39: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 39 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 40: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 40 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials,

TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 41: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 41 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 42: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 42. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 43: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 43.

III. JURISDICTION AND VENUE

ANSWER TO PARAGRAPH 44: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC admit that Plaintiffs make various allegations in the Complaint and otherwise deny the allegations set forth in paragraph 44.

ANSWER TO PARAGRAPH 45: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC admit that Plaintiffs allege subject-matter jurisdiction and otherwise deny the allegations set forth in paragraph 45.

ANSWER TO PARAGRAPH 46: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC admit that Plaintiffs allege venue in this District and otherwise deny the allegations set forth in paragraph 46.

ANSWER TO PARAGRAPH 47: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC admit that Plaintiffs allege personal jurisdiction and otherwise deny the allegations set forth in paragraph 47.

ANSWER TO PARAGRAPH 48: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 48.

ANSWER TO PARAGRAPH 49: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 49.

IV. THE PARTIES

ANSWER TO PARAGRAPH 50: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 50.

ANSWER TO PARAGRAPH 51: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 51.

ANSWER TO PARAGRAPH 52: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 52.

ANSWER TO PARAGRAPH 53: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 53.

ANSWER TO PARAGRAPH 54: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 54.

ANSWER TO PARAGRAPH 55: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 55.

ANSWER TO PARAGRAPH 56: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 56.

ANSWER TO PARAGRAPH 57: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 57.

ANSWER TO PARAGRAPH 58: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 58.

ANSWER TO PARAGRAPH 59: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 59.

ANSWER TO PARAGRAPH 60: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 60.

ANSWER TO PARAGRAPH 61: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 61.

ANSWER TO PARAGRAPH 62: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 62.

ANSWER TO PARAGRAPH 63: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 63.

ANSWER TO PARAGRAPH 64: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 64.

ANSWER TO PARAGRAPH 65: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 65.

ANSWER TO PARAGRAPH 66: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 66.

ANSWER TO PARAGRAPH 67: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 67.

ANSWER TO PARAGRAPH 68: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 68.

ANSWER TO PARAGRAPH 69: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 69.

ANSWER TO PARAGRAPH 70: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 70.

ANSWER TO PARAGRAPH 71: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 71.

ANSWER TO PARAGRAPH 72: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 72.

ANSWER TO PARAGRAPH 73: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 73.

ANSWER TO PARAGRAPH 74: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 74.

ANSWER TO PARAGRAPH 75: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 75.

ANSWER TO PARAGRAPH 76: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 76.

ANSWER TO PARAGRAPH 77: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 77.

ANSWER TO PARAGRAPH 78: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 78.

ANSWER TO PARAGRAPH 79: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 79.

ANSWER TO PARAGRAPH 80: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 80.

ANSWER TO PARAGRAPH 81: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 81.

ANSWER TO PARAGRAPH 82: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 82.

ANSWER TO PARAGRAPH 83: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 83.

ANSWER TO PARAGRAPH 84: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 84.

ANSWER TO PARAGRAPH 85: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 85.

ANSWER TO PARAGRAPH 86: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 86.

ANSWER TO PARAGRAPH 87: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 87.

ANSWER TO PARAGRAPH 88: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 88.

ANSWER TO PARAGRAPH 89: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 89.

ANSWER TO PARAGRAPH 90: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 90.

ANSWER TO PARAGRAPH 91: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 91.

ANSWER TO PARAGRAPH 92: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 92.

ANSWER TO PARAGRAPH 93: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 93.

ANSWER TO PARAGRAPH 94: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 94.

ANSWER TO PARAGRAPH 95: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 95.

ANSWER TO PARAGRAPH 96: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 96.

ANSWER TO PARAGRAPH 97: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 97.

ANSWER TO PARAGRAPH 98: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 98.

ANSWER TO PARAGRAPH 99: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 99.

ANSWER TO PARAGRAPH 100: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 100.

ANSWER TO PARAGRAPH 101: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 101.

ANSWER TO PARAGRAPH 102: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 102.

ANSWER TO PARAGRAPH 103: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 103.

ANSWER TO PARAGRAPH 104: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 104.

ANSWER TO PARAGRAPH 105: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 105.

ANSWER TO PARAGRAPH 106: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 106.

ANSWER TO PARAGRAPH 107: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 107.

ANSWER TO PARAGRAPH 108: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 108.

ANSWER TO PARAGRAPH 109: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 109.

ANSWER TO PARAGRAPH 110: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 110.

ANSWER TO PARAGRAPH 111: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 111.

ANSWER TO PARAGRAPH 112: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 112.

ANSWER TO PARAGRAPH 113: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 113.

ANSWER TO PARAGRAPH 114: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 114.

ANSWER TO PARAGRAPH 115: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 115.

ANSWER TO PARAGRAPH 116: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 116.

ANSWER TO PARAGRAPH 117: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 117.

ANSWER TO PARAGRAPH 118: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 118.

ANSWER TO PARAGRAPH 119: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 119.

ANSWER TO PARAGRAPH 120: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 120.

ANSWER TO PARAGRAPH 121: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 121.

ANSWER TO PARAGRAPH 122: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 122.

ANSWER TO PARAGRAPH 123: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 123.

ANSWER TO PARAGRAPH 124: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 124.

ANSWER TO PARAGRAPH 125: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 125.

ANSWER TO PARAGRAPH 126: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 126.

ANSWER TO PARAGRAPH 127: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 127.

ANSWER TO PARAGRAPH 128: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 128.

ANSWER TO PARAGRAPH 129: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 129.

ANSWER TO PARAGRAPH 130: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 130.

ANSWER TO PARAGRAPH 131: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 131.

ANSWER TO PARAGRAPH 132: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 132.

ANSWER TO PARAGRAPH 133: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 133.

ANSWER TO PARAGRAPH 134: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 134.

ANSWER TO PARAGRAPH 135: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 135.

ANSWER TO PARAGRAPH 136: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 136.

ANSWER TO PARAGRAPH 137: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 137.

ANSWER TO PARAGRAPH 138: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 138.

ANSWER TO PARAGRAPH 139: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 139.

ANSWER TO PARAGRAPH 140: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 140.

ANSWER TO PARAGRAPH 141: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 141.

ANSWER TO PARAGRAPH 142: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 142.

ANSWER TO PARAGRAPH 143: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 143.

ANSWER TO PARAGRAPH 144: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 144.

ANSWER TO PARAGRAPH 145: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 145.

ANSWER TO PARAGRAPH 146: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 146.

ANSWER TO PARAGRAPH 147: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 147.

ANSWER TO PARAGRAPH 148: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 148.

ANSWER TO PARAGRAPH 149: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 149.

ANSWER TO PARAGRAPH 150: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 150.

ANSWER TO PARAGRAPH 151: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 151.

ANSWER TO PARAGRAPH 152: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 152.

ANSWER TO PARAGRAPH 153: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 153.

ANSWER TO PARAGRAPH 154: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 154.

ANSWER TO PARAGRAPH 155: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 155.

ANSWER TO PARAGRAPH 156: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 156.

ANSWER TO PARAGRAPH 157: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 157.

ANSWER TO PARAGRAPH 158: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 158.

ANSWER TO PARAGRAPH 159: TRCLP and RMC deny the allegations set forth in paragraph 159, except admit that TRCLP and RMC are each incorporated and headquartered in New York, New York. RMC admits that it manages properties in multiple cities across the country and TRCLP admits that it operates in multiple cities across the country.

ANSWER TO PARAGRAPH 160: TRCLP and RMC deny the allegations set forth in paragraph 160, except RMC admits that it has used LRO.

ANSWER TO PARAGRAPH 161: TRCLP and RMC deny the allegations set forth in paragraph 161.

ANSWER TO PARAGRAPH 162: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 162.

ANSWER TO PARAGRAPH 163: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 163.

ANSWER TO PARAGRAPH 164: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 164.

ANSWER TO PARAGRAPH 165: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 165.

ANSWER TO PARAGRAPH 166: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 166.

ANSWER TO PARAGRAPH 167: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 167.

ANSWER TO PARAGRAPH 168: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 168.

ANSWER TO PARAGRAPH 169: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 169.

ANSWER TO PARAGRAPH 170: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 170.

ANSWER TO PARAGRAPH 171: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 171.

ANSWER TO PARAGRAPH 172: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 172.

ANSWER TO PARAGRAPH 173: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 173.

ANSWER TO PARAGRAPH 174: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 174.

ANSWER TO PARAGRAPH 175: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 175.

ANSWER TO PARAGRAPH 176: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 176.

ANSWER TO PARAGRAPH 177: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 177.

ANSWER TO PARAGRAPH 178: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 178.

ANSWER TO PARAGRAPH 179: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 179.

ANSWER TO PARAGRAPH 180: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 180.

ANSWER TO PARAGRAPH 181: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 181.

ANSWER TO PARAGRAPH 182: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 182.

ANSWER TO PARAGRAPH 183: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 183.

ANSWER TO PARAGRAPH 184: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 184.

ANSWER TO PARAGRAPH 185: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 185.

ANSWER TO PARAGRAPH 186: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 186.

ANSWER TO PARAGRAPH 187: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 187.

ANSWER TO PARAGRAPH 188: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 188.

ANSWER TO PARAGRAPH 189: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 189.

ANSWER TO PARAGRAPH 190: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 190.

ANSWER TO PARAGRAPH 191: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 191.

ANSWER TO PARAGRAPH 192: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 192.

ANSWER TO PARAGRAPH 193: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 193.

ANSWER TO PARAGRAPH 194: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 194.

ANSWER TO PARAGRAPH 195: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties and otherwise deny the allegations set forth in paragraph 195.

ANSWER TO PARAGRAPH 196: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 196.

ANSWER TO PARAGRAPH 197: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 197.

ANSWER TO PARAGRAPH 198: TRCLP and RMC deny that they are “Owner-Operators” as defined in the Complaint. TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 198.

ANSWER TO PARAGRAPH 199: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 199.

ANSWER TO PARAGRAPH 200: TRCLP and RMC deny the allegations set forth in paragraph 200.

ANSWER TO PARAGRAPH 201: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 201.

V. FACTUAL ALLEGATIONS

A. Historical Competition Among Residential Property Managers.

ANSWER TO PARAGRAPH 202: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 202 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 203: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 203 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 204: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 204. To the extent the Complaint is quoting

documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 205: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 205.

ANSWER TO PARAGRAPH 206: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 206. To the extent the Complaint is quoting documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 207: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 207. To the extent the Complaint is quoting documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

B. Evolution of RealPage's Revenue Management Solutions.

ANSWER TO PARAGRAPH 208: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and

otherwise deny the allegations set forth in paragraph 208. To the extent the Complaint is quoting documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 209: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 209 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 210: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 210 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 211: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 211. To the extent the Complaint is quoting documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 212: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 212.

ANSWER TO PARAGRAPH 213: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 213 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 214: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 214 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 215: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 215 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 216: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 216 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third

parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 217: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 217.

ANSWER TO PARAGRAPH 218: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 218 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 219: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and

otherwise deny the allegations set forth in paragraph 219. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 220: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 220 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 221: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 221 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 222: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and to the extent they allege that TRCLP and/or RMC received competitor data through LRO. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in paragraph 222.

ANSWER TO PARAGRAPH 223: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 223 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and to the extent they allege that TRCLP and/or RMC received competitor data through LRO. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 224: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 224 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend

that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and to the extent they allege that TRCLP and/or RMC received competitor data through LRO. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 225: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, deny the allegations to the extent the paragraph alleges that TRCLP and/or RMC received competitor data through LRO, and otherwise deny the allegations set forth in paragraph 225. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 226: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, deny the allegations to the extent the paragraph alleges that TRCLP and/or RMC received competitor data through LRO, and otherwise deny the allegations set forth in paragraph 226. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

C. Property Management Companies Effectively Outsourced Pricing and Supply Decisions to RealPage, Eliminating Competition.

ANSWER TO PARAGRAPH 227: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, deny the allegations to the extent the paragraph alleges that TRCLP and/or RMC received competitor data through LRO, and otherwise deny the allegations set forth in paragraph 227.

ANSWER TO PARAGRAPH 228: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 228. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 229: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 229. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 230: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 230. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 231: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 231.

ANSWER TO PARAGRAPH 232: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 232 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 233: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 233 to

the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 234: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 234. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 235: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 235 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 236: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 236 regarding how other defendants

or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 237: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 237 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 238: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 238 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 239: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 239 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 240: TRCLP an and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 240 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 241: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 241 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 242: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 242 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 243: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 243 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 244: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 244 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 245: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 245.

ANSWER TO PARAGRAPH 246: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 246 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 247: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 247 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 248: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 248 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 249: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 249 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 250: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 250 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 251: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 251.

ANSWER TO PARAGRAPH 252: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 252 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 253: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 253. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 254: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 254 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

D. Defendants Collectively Monitor Compliance with the Scheme.

ANSWER TO PARAGRAPH 255: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 255.

ANSWER TO PARAGRAPH 256: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 256 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 257: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements,

regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 257 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 258: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 258 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 259: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 259 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 260: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they

relate to other defendants or third parties, and deny the allegations set forth in paragraph 260 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 261: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 261 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 262: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 262 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 263: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 263 to

the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 264: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 264 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 265: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 265 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 266: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 266 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or

otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 267: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 267 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 268: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 268 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 269: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 269 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further

state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 270: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 270 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 271: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 271 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 272: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 272 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or

otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 273: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 273 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 274: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 274.

ANSWER TO PARAGRAPH 275: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 275 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 276: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 276 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 277: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 277 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 278: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 278 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 279: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 279 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 280: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 280.

ANSWER TO PARAGRAPH 281: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 281.

ANSWER TO PARAGRAPH 282: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 282 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 283: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 283 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 284: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 284 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 285: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 285 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 286: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 286 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

E. Property Owners and Managers Who Adopted RealPage's Pricing Recommendations Did So With the Common Goal of Raising Rent Prices Which Caused Inflated Rental Prices and Reduced Occupancy Levels in Their Respective Metro Areas.

ANSWER TO PARAGRAPH 287: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 287.

ANSWER TO PARAGRAPH 288: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 288.

ANSWER TO PARAGRAPH 289: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 289.

ANSWER TO PARAGRAPH 290: TRCLP and RMC and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties. TRCLP and RMC deny that they agreed to such Terms of Service for LRO and otherwise deny the allegations set forth in paragraph 290.

ANSWER TO PARAGRAPH 291: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 291 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 292: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 292 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to

them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 293: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 293.

ANSWER TO PARAGRAPH 294: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 294 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 295: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 295 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend

that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 296: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 296 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 297: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 297 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is

quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 298: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 298. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 299: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 299 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 300: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 300 regarding how other defendants

or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 301: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 301 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 302: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 302 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 303: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and

otherwise deny the allegations set forth in paragraph 303. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 304: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 304 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 305: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 305 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and

RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 306: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 306 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 307: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 307 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 308: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 308 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or

otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 309: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 309 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 310: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 310 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 311: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 311 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 312: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 312 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in this paragraph.

F. Property Owners and Managers Conspired Through Trade Associations to Standardize Lease Terms Unfavorable to Plaintiffs and Members of the Class.

ANSWER TO PARAGRAPH 313: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 313 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in this paragraph.

ANSWER TO PARAGRAPH 314: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 314 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third

parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 315: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 315 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 316: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 316 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 317: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 317 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend

that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 318: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 318.

ANSWER TO PARAGRAPH 319: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 319 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 320: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 320 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend

that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 321: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 321.

ANSWER TO PARAGRAPH 322: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 322.

ANSWER TO PARAGRAPH 323: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 323.

ANSWER TO PARAGRAPH 324: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 324 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 325: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 325.

ANSWER TO PARAGRAPH 326: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 326.

ANSWER TO PARAGRAPH 327: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 327.

ANSWER TO PARAGRAPH 328: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 328.

ANSWER TO PARAGRAPH 329: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 329.

ANSWER TO PARAGRAPH 330: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 330.

ANSWER TO PARAGRAPH 331: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 331 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

G. Preliminary Economic Analysis Confirms the Impact of RealPage's Revenue Management on Multifamily Rental Markets Nationwide.

ANSWER TO PARAGRAPH 332: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the

extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 332.

i. Defendants' Increased Revenues Resulted from Proportionally Higher, Artificially Inflated Rent Increases.

ANSWER TO PARAGRAPH 333: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 333 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 334: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 334. To the extent the Complaint is quoting, citing to, or characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 335: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 335. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 336: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding any purported witness statements, regarding how other defendants or third parties operate their businesses, and to the extent they relate to other defendants or third parties, and deny the allegations set forth in paragraph 336 to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ii. Owners, Owner-Operators, and Managing Defendants Engaged in Tacit Collusion to Artificially Increase Multifamily Rental Prices.

ANSWER TO PARAGRAPH 337: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 337.

ANSWER TO PARAGRAPH 338: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 338 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third

parties, and deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct. TRCLP and RMC further state that this paragraph contains no allegations specific to them and on that basis otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 339: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 339 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, admit that RMC manages property in Tennessee, and otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 340: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 340 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, admit that RMC manages property in Georgia, and otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 341: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 341 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, admit that RMC manages property in Boston, MA, and otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 342: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 342 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third

parties, admit that RMC manages property in Texas, and otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 343: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 343 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 344: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 344 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, admit that RMC manages property in Washington, DC, and otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 345: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 345.

ANSWER TO PARAGRAPH 346: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 346.

ANSWER TO PARAGRAPH 347: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 347 regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, admit that RMC manages property in New York, NY, and otherwise deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 348: TRCLP and RMC deny the allegations set forth in paragraph 348.

ANSWER TO PARAGRAPH 349: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 349.

ANSWER TO PARAGRAPH 350: TRCLP and RMC deny the allegations set forth in paragraph 350.

iii. Supply and Demand Factors Do Not Explain Inflated Rental Prices.

ANSWER TO PARAGRAPH 351: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 351.

ANSWER TO PARAGRAPH 352: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 352.

ANSWER TO PARAGRAPH 353: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 353.

ANSWER TO PARAGRAPH 354: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 354.

iv. Atlanta Submarket.

ANSWER TO PARAGRAPH 355: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 355 regarding how other defendants

or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 355.

ANSWER TO PARAGRAPH 356: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 356.

ANSWER TO PARAGRAPH 357: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 357.

ANSWER TO PARAGRAPH 358: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 358.

ANSWER TO PARAGRAPH 359: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 359.

ANSWER TO PARAGRAPH 360: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 360.

v. Orlando Submarket.

ANSWER TO PARAGRAPH 361: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 361. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

vi. Phoenix Submarket.

ANSWER TO PARAGRAPH 362: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 362. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

vii. Fort Worth (Dallas Submarket).

ANSWER TO PARAGRAPH 363: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 363. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 364: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 364.

ANSWER TO PARAGRAPH 365: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 365.

H. “Plus Factors” in the Multifamily Rental Housing Market Provide Additional Evidence of a Price Fixing Conspiracy.

ANSWER TO PARAGRAPH 366: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 366.

ANSWER TO PARAGRAPH 367: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 367.

i. The Multifamily Rental Market Is Highly Concentrated.

ANSWER TO PARAGRAPH 368: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in the paragraph 368.

ii. High Barriers to Entry.

ANSWER TO PARAGRAPH 369: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in the paragraph regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, otherwise deny the allegations set forth in paragraph 369.

ANSWER TO PARAGRAPH 370: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in the paragraph regarding how other

defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, otherwise deny the allegations set forth in paragraph 370.

ANSWER TO PARAGRAPH 371: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 371.

iii. High Switching Costs for Renters.

ANSWER TO PARAGRAPH 372: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 372.

ANSWER TO PARAGRAPH 373: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 373.

ANSWER TO PARAGRAPH 374: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 374.

iv. Inelasticity of Demand.

ANSWER TO PARAGRAPH 375: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 375.

ANSWER TO PARAGRAPH 376: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 376.

v. Multifamily Rental Housing Units Are a Fungible Product.

ANSWER TO PARAGRAPH 377: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 377.

ANSWER TO PARAGRAPH 378: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 378.

ANSWER TO PARAGRAPH 379: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 379.

vi. Defendants Exchange Competitively Sensitive Information.

ANSWER TO PARAGRAPH 380: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 380.

vii. Motive, Opportunities, and Invitations to Collude.

ANSWER TO PARAGRAPH 381: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 381.

ANSWER TO PARAGRAPH 382: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 382.

ANSWER TO PARAGRAPH 383: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 383.

ANSWER TO PARAGRAPH 384: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or

conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 384.

ANSWER TO PARAGRAPH 385: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 385.

ANSWER TO PARAGRAPH 386: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 386.

ANSWER TO PARAGRAPH 387: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 387.

ANSWER TO PARAGRAPH 388: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 388. To the extent the Complaint is quoting or citing to documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 389: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 389.

ANSWER TO PARAGRAPH 390: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 390.

ANSWER TO PARAGRAPH 391: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 391.

VI. RELEVANT MARKET

ANSWER TO PARAGRAPH 392: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 392.

ANSWER TO PARAGRAPH 393: TRCLP and RMC state that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 393.

A. The Relevant Product Market Is Multifamily Residential Real Estate Leases.

ANSWER TO PARAGRAPH 394: TRCLP and RMC state that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 394.

ANSWER TO PARAGRAPH 395: TRCLP and RMC state that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 395.

ANSWER TO PARAGRAPH 396: TRCLP and RMC state that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 396.

ANSWER TO PARAGRAPH 397: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 397.

ANSWER TO PARAGRAPH 398: TRCLP and RMC state that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 398.

ANSWER TO PARAGRAPH 399: TRCLP and RMC state that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 399.

B. Defendants' Market Power in the Multifamily Residential Real Estate Market.

ANSWER TO PARAGRAPH 400: TRCLP and RMC state that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny knowledge or information sufficient to form a belief regarding the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph deny the allegations set forth in paragraph 400.

ANSWER TO PARAGRAPH 401: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 401.

ANSWER TO PARAGRAPH 402: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 402. To the extent the Complaint is quoting, citing to, or otherwise characterizing documents or other written materials, TRCLP and RMC respectfully refer the Court to those documents or other written materials for an accurate and complete statement of their contents.

ANSWER TO PARAGRAPH 403: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 403.

ANSWER TO PARAGRAPH 404: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 404.

C. Regional Submarkets

ANSWER TO PARAGRAPH 405: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 405.

ANSWER TO PARAGRAPH 406: TRCLP and RMC state that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC admit that they operate in multiple regions across the country and otherwise deny the allegations set forth in paragraph 406.

ANSWER TO PARAGRAPH 407: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 407.

ANSWER TO PARAGRAPH 408: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 408.

ANSWER TO PARAGRAPH 409: TRCLP and RMC state that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, Defendant deny the allegations set forth in paragraph 409.

i. Nashville, Tennessee

ANSWER TO PARAGRAPH 410: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 410.

ANSWER TO PARAGRAPH 411: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 411.

ANSWER TO PARAGRAPH 412: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 412.

ANSWER TO PARAGRAPH 413: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 413, except admit that RMC managed properties that used RealPage pricing software in Tennessee.

ANSWER TO PARAGRAPH 414: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 414.

ANSWER TO PARAGRAPH 415: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 415.

ii. Atlanta, Georgia

ANSWER TO PARAGRAPH 416: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 416.

ANSWER TO PARAGRAPH 417: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 417.

ANSWER TO PARAGRAPH 418: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 418.

ANSWER TO PARAGRAPH 419: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 419, except admit that RMC managed properties that used RealPage pricing software in Georgia.

ANSWER TO PARAGRAPH 420: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 420.

ANSWER TO PARAGRAPH 421: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 421.

iii. Austin, Texas

ANSWER TO PARAGRAPH 422: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 422.

ANSWER TO PARAGRAPH 423: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 423.

ANSWER TO PARAGRAPH 424: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 424.

ANSWER TO PARAGRAPH 425: TRCLP and RMC deny the allegations set forth in the paragraph to the extent they purport to and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 425.

ANSWER TO PARAGRAPH 426: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 426.

ANSWER TO PARAGRAPH 427: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 427.

iv. Baltimore, Maryland

ANSWER TO PARAGRAPH 428: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 428.

ANSWER TO PARAGRAPH 429: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 429.

ANSWER TO PARAGRAPH 430: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 430.

ANSWER TO PARAGRAPH 431: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 431.

ANSWER TO PARAGRAPH 432: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 432.

ANSWER TO PARAGRAPH 433: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 433.

ANSWER TO PARAGRAPH 434: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 434.

v. Boston, Massachusetts

ANSWER TO PARAGRAPH 435: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 435.

ANSWER TO PARAGRAPH 436: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 436.

ANSWER TO PARAGRAPH 437: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 437.

ANSWER TO PARAGRAPH 438: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 438, except admit that RMC managed properties that used RealPage pricing software in Boston, MA.

ANSWER TO PARAGRAPH 439: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 439.

ANSWER TO PARAGRAPH 440: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 440.

ANSWER TO PARAGRAPH 441: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 441.

vi. Charlotte, North Carolina

ANSWER TO PARAGRAPH 442: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 442.

ANSWER TO PARAGRAPH 443: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in the paragraph to the extent they purport to describe or relate to other Defendants' businesses, otherwise deny the allegations set forth in paragraph 443.

ANSWER TO PARAGRAPH 444: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 444.

ANSWER TO PARAGRAPH 445: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 445.

ANSWER TO PARAGRAPH 446: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 446.

ANSWER TO PARAGRAPH 447: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 447.

vii. Chicago, Illinois

ANSWER TO PARAGRAPH 448: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 448.

ANSWER TO PARAGRAPH 449: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 449.

ANSWER TO PARAGRAPH 450: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 450.

ANSWER TO PARAGRAPH 451: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 451, except admit that RMC managed properties that used RealPage pricing software in Chicago IL.

ANSWER TO PARAGRAPH 452: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 452.

ANSWER TO PARAGRAPH 453: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 453.

viii. Dallas, Texas

ANSWER TO PARAGRAPH 454: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 454.

ANSWER TO PARAGRAPH 455: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 455.

ANSWER TO PARAGRAPH 456: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 456.

ANSWER TO PARAGRAPH 457: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 457.

ANSWER TO PARAGRAPH 458: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 458.

ANSWER TO PARAGRAPH 459: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 459.

ix. Denver, Colorado

ANSWER TO PARAGRAPH 460: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 460.

ANSWER TO PARAGRAPH 461: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 461.

ANSWER TO PARAGRAPH 462: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 462.

ANSWER TO PARAGRAPH 463: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 463.

ANSWER TO PARAGRAPH 464: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 464.

ANSWER TO PARAGRAPH 465: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 465.

ANSWER TO PARAGRAPH 466: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 466.

x. Detroit, Michigan

ANSWER TO PARAGRAPH 467: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 467.

ANSWER TO PARAGRAPH 468: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 468.

ANSWER TO PARAGRAPH 469: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 469.

ANSWER TO PARAGRAPH 470: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 470.

ANSWER TO PARAGRAPH 471: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 471.

ANSWER TO PARAGRAPH 472: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 472.

xi. Houston, Texas

ANSWER TO PARAGRAPH 473: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 473.

ANSWER TO PARAGRAPH 474: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 474.

ANSWER TO PARAGRAPH 475: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 475.

ANSWER TO PARAGRAPH 476: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 476.

ANSWER TO PARAGRAPH 477: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 477.

ANSWER TO PARAGRAPH 478: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 478.

xii. Jacksonville, Florida

ANSWER TO PARAGRAPH 479: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 479.

ANSWER TO PARAGRAPH 480: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 480.

ANSWER TO PARAGRAPH 481: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 481.

ANSWER TO PARAGRAPH 482: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the allegations set forth in paragraph 482.

ANSWER TO PARAGRAPH 483: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 483.

ANSWER TO PARAGRAPH 484: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 484.

xiii. Las Vegas, Nevada

ANSWER TO PARAGRAPH 485: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 485.

ANSWER TO PARAGRAPH 486: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 486.

ANSWER TO PARAGRAPH 487: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 487.

ANSWER TO PARAGRAPH 488: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 488.

ANSWER TO PARAGRAPH 489: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 489.

ANSWER TO PARAGRAPH 490: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 490.

xiv. Los Angeles, California

ANSWER TO PARAGRAPH 491: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 491.

ANSWER TO PARAGRAPH 492: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 492.

ANSWER TO PARAGRAPH 493: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 493.

ANSWER TO PARAGRAPH 494: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 494, except admit that RMC managed properties that used RealPage pricing software in Los Angeles.

ANSWER TO PARAGRAPH 495: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 495.

ANSWER TO PARAGRAPH 496: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 496.

ANSWER TO PARAGRAPH 497: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 497.

xv. Memphis, Tennessee

ANSWER TO PARAGRAPH 498: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 498.

ANSWER TO PARAGRAPH 499: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 499.

ANSWER TO PARAGRAPH 500: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 500.

ANSWER TO PARAGRAPH 501: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 501.

ANSWER TO PARAGRAPH 502: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 502.

ANSWER TO PARAGRAPH 503: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 503.

xvi. Miami, Florida

ANSWER TO PARAGRAPH 504: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 504.

ANSWER TO PARAGRAPH 505: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 505.

ANSWER TO PARAGRAPH 506: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 506.

ANSWER TO PARAGRAPH 507: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 507.

ANSWER TO PARAGRAPH 508: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 508.

ANSWER TO PARAGRAPH 509: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 509.

xvii. Milwaukee, Wisconsin

ANSWER TO PARAGRAPH 510: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 510.

ANSWER TO PARAGRAPH 511: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 511.

ANSWER TO PARAGRAPH 512: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 512.

ANSWER TO PARAGRAPH 513: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 513.

ANSWER TO PARAGRAPH 514: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 514.

ANSWER TO PARAGRAPH 515: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 515.

xviii. Minneapolis, Minnesota

ANSWER TO PARAGRAPH 516: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 516.

ANSWER TO PARAGRAPH 517: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 517.

ANSWER TO PARAGRAPH 518: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 518.

ANSWER TO PARAGRAPH 519: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 519.

ANSWER TO PARAGRAPH 520: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 520.

ANSWER TO PARAGRAPH 521: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 521.

xix. New York, New York

ANSWER TO PARAGRAPH 522: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 522.

ANSWER TO PARAGRAPH 523: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 523.

ANSWER TO PARAGRAPH 524: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 524.

ANSWER TO PARAGRAPH 525: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 525, except admit that RMC managed properties that used RealPage pricing software in New York, NY.

ANSWER TO PARAGRAPH 526: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 526.

ANSWER TO PARAGRAPH 527: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 527.

ANSWER TO PARAGRAPH 528: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 528.

xx. Orlando, Florida

ANSWER TO PARAGRAPH 529: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 529.

ANSWER TO PARAGRAPH 530: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 530.

ANSWER TO PARAGRAPH 531: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 531.

ANSWER TO PARAGRAPH 532: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 532, except admit that RMC managed properties that used RealPage pricing software in Florida.

ANSWER TO PARAGRAPH 533: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 533.

ANSWER TO PARAGRAPH 534: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 534.

xxi. Philadelphia, Pennsylvania

ANSWER TO PARAGRAPH 535: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 535.

ANSWER TO PARAGRAPH 536: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 536.

ANSWER TO PARAGRAPH 537: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 537.

ANSWER TO PARAGRAPH 538: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 538.

ANSWER TO PARAGRAPH 539: TRCLP and RMC and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 539.

xxii. Phoenix, Arizona

ANSWER TO PARAGRAPH 540: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 540.

ANSWER TO PARAGRAPH 541: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 541.

ANSWER TO PARAGRAPH 542: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 542.

ANSWER TO PARAGRAPH 543: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 543.

ANSWER TO PARAGRAPH 544: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 544.

ANSWER TO PARAGRAPH 545: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 545.

ANSWER TO PARAGRAPH 546: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 546.

xxiii. Pittsburgh, Pennsylvania

ANSWER TO PARAGRAPH 547: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 547.

ANSWER TO PARAGRAPH 548: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 548.

ANSWER TO PARAGRAPH 549: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 549.

ANSWER TO PARAGRAPH 550: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 550.

ANSWER TO PARAGRAPH 551: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 551.

ANSWER TO PARAGRAPH 552: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 552.

xxiv. Portland, Oregon

ANSWER TO PARAGRAPH 553: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 553.

ANSWER TO PARAGRAPH 554: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 554.

ANSWER TO PARAGRAPH 555: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 555.

ANSWER TO PARAGRAPH 556: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 556.

ANSWER TO PARAGRAPH 557: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or

conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 557.

ANSWER TO PARAGRAPH 558: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 558.

ANSWER TO PARAGRAPH 559: TRCLP and RMC and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 559.

xxv. San Diego, California

ANSWER TO PARAGRAPH 560: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 560.

ANSWER TO PARAGRAPH 561: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 561.

ANSWER TO PARAGRAPH 562: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 562.

ANSWER TO PARAGRAPH 563: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 563.

ANSWER TO PARAGRAPH 564: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 564.

ANSWER TO PARAGRAPH 565: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 565.

ANSWER TO PARAGRAPH 566: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 566.

xxvi. San Francisco, California

ANSWER TO PARAGRAPH 567: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 567.

ANSWER TO PARAGRAPH 568: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 568.

ANSWER TO PARAGRAPH 569: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 569.

ANSWER TO PARAGRAPH 570: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 570, except admit that RMC managed properties that used RealPage pricing software in San Francisco.

ANSWER TO PARAGRAPH 571: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 571.

ANSWER TO PARAGRAPH 572: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 572.

ANSWER TO PARAGRAPH 573: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or

conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 573.

xxvii. San Jose, California

ANSWER TO PARAGRAPH 574: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 574.

ANSWER TO PARAGRAPH 575: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 575.

ANSWER TO PARAGRAPH 576: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 576.

ANSWER TO PARAGRAPH 577: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 577.

ANSWER TO PARAGRAPH 578: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or

conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 578.

ANSWER TO PARAGRAPH 579: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 579.

ANSWER TO PARAGRAPH 580: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 580.

xxviii. Seattle, Washington

ANSWER TO PARAGRAPH 581: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 581.

ANSWER TO PARAGRAPH 582: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 582.

ANSWER TO PARAGRAPH 583: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 583.

ANSWER TO PARAGRAPH 584: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 584.

ANSWER TO PARAGRAPH 585: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 585.

ANSWER TO PARAGRAPH 586: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 586.

ANSWER TO PARAGRAPH 587: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 587.

xxix. St. Louis, Missouri

ANSWER TO PARAGRAPH 588: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 588.

ANSWER TO PARAGRAPH 589: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 589.

ANSWER TO PARAGRAPH 590: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 590.

ANSWER TO PARAGRAPH 591: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 591.

ANSWER TO PARAGRAPH 592: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 592.

ANSWER TO PARAGRAPH 593: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 593.

xxx. Tampa, Florida

ANSWER TO PARAGRAPH 594: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 594.

ANSWER TO PARAGRAPH 595: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 595.

ANSWER TO PARAGRAPH 596: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 596.

ANSWER TO PARAGRAPH 597: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 597.

ANSWER TO PARAGRAPH 598: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 598.

ANSWER TO PARAGRAPH 599: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 599.

xxxi. Tucson, Arizona

ANSWER TO PARAGRAPH 600: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 600.

ANSWER TO PARAGRAPH 601: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 601.

ANSWER TO PARAGRAPH 602: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 602.

ANSWER TO PARAGRAPH 603: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 603.

ANSWER TO PARAGRAPH 604: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 604.

ANSWER TO PARAGRAPH 605: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 605.

xxxii. Washington, District of Columbia

ANSWER TO PARAGRAPH 606: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 606.

ANSWER TO PARAGRAPH 607: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 607.

ANSWER TO PARAGRAPH 608: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 608.

ANSWER TO PARAGRAPH 609: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 609, except admit that RMC managed properties that used RealPage pricing software in Washington, DC.

ANSWER TO PARAGRAPH 610: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 610.

ANSWER TO PARAGRAPH 611: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 611.

ANSWER TO PARAGRAPH 612: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 612.

xxxiii. Wilmington, North Carolina

ANSWER TO PARAGRAPH 613: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the accuracy of the data or reports referred to in this paragraph, and otherwise deny the allegations set forth in paragraph 613.

ANSWER TO PARAGRAPH 614: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 614.

ANSWER TO PARAGRAPH 615: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 615.

ANSWER TO PARAGRAPH 616: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 616.

ANSWER TO PARAGRAPH 617: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 617.

ANSWER TO PARAGRAPH 618: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 618.

ANSWER TO PARAGRAPH 619: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 619.

xxxiv. Birmingham-Hoover, AL MSA

ANSWER TO PARAGRAPH 620: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 620.

ANSWER TO PARAGRAPH 621: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 621.

ANSWER TO PARAGRAPH 622: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 622.

ANSWER TO PARAGRAPH 623: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or

conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 623.

ANSWER TO PARAGRAPH 624: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 624.

xxxv. Buffalo, New York

ANSWER TO PARAGRAPH 625: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 625.

ANSWER TO PARAGRAPH 626: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 626.

ANSWER TO PARAGRAPH 627: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 627.

ANSWER TO PARAGRAPH 628: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 628.

ANSWER TO PARAGRAPH 629: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 629.

xxxvi. Cincinnati, Ohio

ANSWER TO PARAGRAPH 630: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 630.

ANSWER TO PARAGRAPH 631: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 631.

ANSWER TO PARAGRAPH 632: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 632.

ANSWER TO PARAGRAPH 633: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 633.

ANSWER TO PARAGRAPH 634: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 634.

xxxvii. Cleveland, Ohio

ANSWER TO PARAGRAPH 635: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 635.

ANSWER TO PARAGRAPH 636: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 636.

ANSWER TO PARAGRAPH 637: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 637.

ANSWER TO PARAGRAPH 638: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 638.

ANSWER TO PARAGRAPH 639: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 639.

xxxviii. Columbus, Ohio

ANSWER TO PARAGRAPH 640: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 640.

ANSWER TO PARAGRAPH 641: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 641.

ANSWER TO PARAGRAPH 642: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 642.

ANSWER TO PARAGRAPH 643: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 643.

ANSWER TO PARAGRAPH 644: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 644.

xxxix. Hartford, Connecticut

ANSWER TO PARAGRAPH 645: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties

operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 645.

ANSWER TO PARAGRAPH 646: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 646.

ANSWER TO PARAGRAPH 647: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 647.

ANSWER TO PARAGRAPH 648: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 648.

ANSWER TO PARAGRAPH 649: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 649.

xl. Riverside, California

ANSWER TO PARAGRAPH 650: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 650.

ANSWER TO PARAGRAPH 651: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 651.

ANSWER TO PARAGRAPH 652: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 652.

ANSWER TO PARAGRAPH 653: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 653.

ANSWER TO PARAGRAPH 654: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 654.

xli. Sacramento, California

ANSWER TO PARAGRAPH 655: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 655.

ANSWER TO PARAGRAPH 656: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 656.

ANSWER TO PARAGRAPH 657: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 657.

ANSWER TO PARAGRAPH 658: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 658.

ANSWER TO PARAGRAPH 659: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 659.

xlii. Salt Lake City, Utah

ANSWER TO PARAGRAPH 660: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 660.

ANSWER TO PARAGRAPH 661: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 661.

ANSWER TO PARAGRAPH 662: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 662.

ANSWER TO PARAGRAPH 663: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or

conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 663.

ANSWER TO PARAGRAPH 664: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 664.

xliii. San Antonio, Texas

ANSWER TO PARAGRAPH 665: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 665.

ANSWER TO PARAGRAPH 666: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 666.

ANSWER TO PARAGRAPH 667: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 667.

ANSWER TO PARAGRAPH 668: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 668.

ANSWER TO PARAGRAPH 669: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 669.

xliv. San Juan, Puerto Rico

ANSWER TO PARAGRAPH 670: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 670.

ANSWER TO PARAGRAPH 671: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 671.

ANSWER TO PARAGRAPH 672: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 672.

xlv. Virginia Beach, Virginia

ANSWER TO PARAGRAPH 673: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 673.

ANSWER TO PARAGRAPH 674: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 674.

ANSWER TO PARAGRAPH 675: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 675.

ANSWER TO PARAGRAPH 676: TRCLP and RMC deny the allegations set forth in this paragraph to the extent they suggest or contend that TRCLP and/or RMC were part of a cartel or conspiracy or otherwise engaged in illegal conduct, and otherwise deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 676.

ANSWER TO PARAGRAPH 677: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations regarding how other defendants or third parties operate their businesses and to the extent they relate to other defendants or third parties, and otherwise deny the allegations set forth in paragraph 677.

ANSWER TO PARAGRAPH 678: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 678.

ANSWER TO PARAGRAPH 679: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 679.

ANSWER TO PARAGRAPH 680: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 680.

VII. CLASS ACTION ALLEGATIONS

ANSWER TO PARAGRAPH 681: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 681.

ANSWER TO PARAGRAPH 682: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 682.

ANSWER TO PARAGRAPH 683: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 683.

ANSWER TO PARAGRAPH 684: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 684.

ANSWER TO PARAGRAPH 685: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 685.

ANSWER TO PARAGRAPH 686: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 686.

ANSWER TO PARAGRAPH 687: TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 687.

ANSWER TO PARAGRAPH 688: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 688.

ANSWER TO PARAGRAPH 689: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 689.

ANSWER TO PARAGRAPH 690: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny knowledge or information sufficient to form a belief as to the truth of the allegations as to what Plaintiffs claim to know, and otherwise deny the allegations set forth in paragraph 690.

VIII. ANTITRUST INJURY

ANSWER TO PARAGRAPH 691: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 691.

ANSWER TO PARAGRAPH 692: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 692.

ANSWER TO PARAGRAPH 693: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 693.

IX. CONTINUING VIOLATION

ANSWER TO PARAGRAPH 694: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 694.

ANSWER TO PARAGRAPH 695: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 695.

ANSWER TO PARAGRAPH 696: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 696.

ANSWER TO PARAGRAPH 697: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 697.

ANSWER TO PARAGRAPH 698: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 698.

ANSWER TO PARAGRAPH 699: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 699.

ANSWER TO PARAGRAPH 700: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 700.

X. CLAIMS FOR RELIEF

COUNT I

Price Fixing in Violation of Section 1 of the Sherman Act (15 U.S.C. § 1)

ANSWER TO PARAGRAPH 701: TRCLP and RMC repeat the responses set forth above as if fully set forth herein.

ANSWER TO PARAGRAPH 702: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 702.

ANSWER TO PARAGRAPH 703: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 703.

ANSWER TO PARAGRAPH 704: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 704.

ANSWER TO PARAGRAPH 705: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 705.

ANSWER TO PARAGRAPH 706: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 706.

ANSWER TO PARAGRAPH 707: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 707.

COUNT II
Violation of State Antitrust Statutes
(On behalf of Plaintiffs and the Class)

ANSWER TO PARAGRAPH 708: TRCLP and RMC repeat and reiterates the responses set forth above as if fully set forth herein.

ANSWER TO PARAGRAPH 709: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 709.

ANSWER TO PARAGRAPH 710: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 710.

ANSWER TO PARAGRAPH 711: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 711.

ANSWER TO PARAGRAPH 712: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 712.

ANSWER TO PARAGRAPH 713: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 713.

ANSWER TO PARAGRAPH 714: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 714.

ANSWER TO PARAGRAPH 715: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 715.

ANSWER TO PARAGRAPH 716: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 716.

ANSWER TO PARAGRAPH 717: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 717.

ANSWER TO PARAGRAPH 718: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 718.

ANSWER TO PARAGRAPH 719: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 719.

ANSWER TO PARAGRAPH 720: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 720.

ANSWER TO PARAGRAPH 721: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 721.

ANSWER TO PARAGRAPH 722: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 722.

ANSWER TO PARAGRAPH 723: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 723.

ANSWER TO PARAGRAPH 724: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 724.

ANSWER TO PARAGRAPH 725: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 725.

ANSWER TO PARAGRAPH 726: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 726.

ANSWER TO PARAGRAPH 727: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 727.

ANSWER TO PARAGRAPH 728: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 728.

ANSWER TO PARAGRAPH 729: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 729.

ANSWER TO PARAGRAPH 730: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 730.

ANSWER TO PARAGRAPH 731: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 731.

ANSWER TO PARAGRAPH 732: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 732.

ANSWER TO PARAGRAPH 733: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 733.

ANSWER TO PARAGRAPH 734: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 734.

ANSWER TO PARAGRAPH 735: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 735.

ANSWER TO PARAGRAPH 736: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 736.

ANSWER TO PARAGRAPH 737: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 737.

ANSWER TO PARAGRAPH 738: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 738.

ANSWER TO PARAGRAPH 739: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 739.

ANSWER TO PARAGRAPH 740: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 740.

ANSWER TO PARAGRAPH 741: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 741.

ANSWER TO PARAGRAPH 742: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 742.

ANSWER TO PARAGRAPH 743: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 743.

ANSWER TO PARAGRAPH 744: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 744.

ANSWER TO PARAGRAPH 745: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 745.

ANSWER TO PARAGRAPH 746: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 746.

ANSWER TO PARAGRAPH 747: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 747.

ANSWER TO PARAGRAPH 748: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 748.

ANSWER TO PARAGRAPH 749: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 749.

ANSWER TO PARAGRAPH 750: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 750.

ANSWER TO PARAGRAPH 751: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 751.

ANSWER TO PARAGRAPH 752: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 752.

ANSWER TO PARAGRAPH 753: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 753.

ANSWER TO PARAGRAPH 754: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 754.

ANSWER TO PARAGRAPH 755: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 755.

ANSWER TO PARAGRAPH 756: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 756.

ANSWER TO PARAGRAPH 757: TRCLP and RMC state that the allegations in this paragraph constitute legal conclusions to which no response is required. To the extent a response is required, TRCLP and RMC deny the allegations set forth in paragraph 757.

XI. PRAYER FOR RELIEF

TRCLP and RMC deny that Plaintiffs are entitled to any of the relief requested in paragraphs A through E of the Prayer for Relief contained in the Complaint and further deny that Plaintiffs are entitled to any relief whatsoever. TRCLP and RMC further request that they be awarded costs and fees and/or other relief that the Court deems just and proper.

XII. JURY DEMANDED

TRCLP and RMC admit that Plaintiffs have demanded a trial by jury. TRCLP and RMC further state that, to the extent certain named Plaintiffs and unnamed class members have signed valid and enforceable jury waivers, TRCLP and RMC intend to enforce them.

AFFIRMATIVE DEFENSES

Without assuming any burden that it would not otherwise bear, TRCLP and RMC assert the following avoidances and defenses to Plaintiffs' claims. Nothing herein shall be construed as an admission of any kind.

Federal Rule of Civil Procedure 8 sets forth the avoidances and defenses that must be affirmatively stated in a pleading. *See* Fed. R. Civ. P. 8(c) ("In responding to a pleading, a party must affirmatively state any avoidance or affirmative defense, including: [identified affirmative defenses].").

To the extent necessary, TRCLP and RMC allege that Plaintiffs' claims are barred because the acts Plaintiffs allege TRCLP and RMC undertook in furtherance of the alleged conspiracy were in TRCLP and RMC's unilateral business interest. TRCLP and RMC reserve

the right to assert additional avoidances and defenses as they become known during discovery and based on the record as it develops, up to and including the time of trial.

FIRST DEFENSE

(Failure To State A Claim)

Plaintiffs' claims are barred in whole or in part because Plaintiffs' Complaint fails to state facts upon which relief can be granted.

SECOND DEFENSE

(Statute of Limitations)

Plaintiffs' claims are barred, in whole or in part, by the applicable statute of limitations. To the extent Plaintiffs seek to bring claims outside the applicable statute of limitations, Plaintiffs' Complaint is time-barred. To the extent that Plaintiffs' Complaint relies on information made public more than four years ago, Plaintiff's Complaint is time-barred.

THIRD DEFENSE

(No injury)

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have not suffered any injury in fact or any injury cognizable under the antitrust laws. Plaintiffs' alleged harm lies in their speculation that many companies colluded seamlessly through a conspiracy, resulting in their harm. In essence, Plaintiffs complain about the impact of naturally unpredictable changes in the market conditions that exist in the global, national, and local economy. To the extent that Plaintiffs maintain that they were injured by these events, such an injury is not cognizable under the antitrust laws.

FOURTH DEFENSE

(Failure To Mitigate)

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs failed to exercise reasonable care to mitigate any damages they may have suffered. To the extent Plaintiffs believed that TRCLP and/or RMC agreed to use RealPage Revenue Management software and that such agreement had the effect of raising rental prices above competitive levels, Plaintiffs had an obligation to mitigate their damages by seeking other sources of supply, including from other property managers or owners. Plaintiffs' failure to exercise reasonable care to mitigate damages was the complete or partial cause of any damages Plaintiffs may have suffered.

FIFTH DEFENSE

(Lack of Proximate Cause & Intervening/Superseding Conduct)

Plaintiffs' claims are barred, in whole or in part, because any alleged injuries and damages either were not legally or proximately caused by any acts or omissions of TRCLP and/or RMC or were caused, if at all, solely and proximately by Plaintiffs' conduct or by the conduct of third parties including, without limitation, the prior, intervening, or superseding conduct of Plaintiffs or such third parties.

SIXTH DEFENSE

(Waiver)

Plaintiffs' claims are barred, in whole or in part, by the doctrine of waiver. Plaintiffs' continued rental leases at what they now allege are prices above the competitive level manifest an intention to waive any right to bring this suit and are inconsistent with any other intention. Plaintiffs, by their actions, accepted the benefits of an ongoing relationship with Defendants and relinquished their rights to bring suit.

SEVENTH DEFENSE

(Laches)

Plaintiffs' claims are barred by the equitable doctrine of laches. Plaintiffs demonstrated an unreasonable lack of diligence in bringing their claims. Plaintiffs' unreasonable lack of diligence in bringing their claims now bars them.

EIGHTH DEFENSE

(Consent)

Plaintiffs' claims are barred, in whole or in part, due to their ratification of, and consent to, the conduct of TRCLP and/or RMC. Plaintiffs' Complaint demonstrates its long-standing ratification of and consent to the complained-of conduct. Accordingly, because Plaintiffs have been aware for years of the very same conduct they now challenge—and because some of that conduct provided Plaintiffs a direct benefit—Plaintiffs' claims are barred by the doctrine of ratification.

NINTH DEFENSE

(*Noerr-Pennington* & Free Speech)

Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs seeks to impose liability on TRCLP and/or RMC based on the exercise of any person or entity's right to petition federal, state, and local governmental bodies, including through public statements, because such conduct was immune under the *Noerr-Pennington* doctrine and privileged under the First Amendment to the U.S. Constitution.

TENTH DEFENSE

(Arbitration Agreements, Class Action Waivers, or Other Contractual Terms)

Plaintiffs' claims are barred, in whole or in part, to the extent the rental lease agreements pursuant to which Plaintiffs rented their apartments or other agreements a Plaintiff entered into

contain arbitration clauses, clauses providing a different forum for the resolution of their claims, or provisions waiving a Plaintiff's ability to bring a representative or class action claim.

ELEVENTH DEFENSE

(Right to Set Off Amounts Paid)

Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, by non-settling Defendants' right to set off any amounts paid to Plaintiffs by any Defendants who have settled, or do settle, Plaintiffs' claims against them in this action.

TWELFTH DEFENSE

(Contracts Without Any Purported Overcharge)

Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs entered into contracts that do not include any purported overcharge.

THIRTEENTH DEFENSE

(Improper Damages)

Plaintiffs' claims are barred, in whole or in part, to the extent they seek improper multiple damage awards, and damage awards duplicative of those sought in other actions, in violation of the Due Process guarantees of the Fifth and Fourteenth Amendments of the United States Constitution and of the Eighth Amendment of the United States Constitution.

FOURTEENTH DEFENSE

(Acquiescence)

Plaintiffs' claims are barred, in whole or in part, by the Plaintiffs' knowing acquiescence to the restraints of trade alleged in the Complaint.

FIFTEENTH DEFENSE

(Damages Reduced by Plaintiffs' Conduct)

Upon information and belief, Plaintiffs' claims are barred, in whole or in part, by Defendants' right to set off any amount paid to Plaintiffs by damages attributable to Plaintiffs' conduct to the extent Plaintiffs unlawfully shared information found to be competitively sensitive regarding their rental lease agreements or potential alternative rental lease agreements.

SIXTEENTH DEFENSE

(Lack of Standing)

Plaintiffs' claims are barred, in whole or in part, insofar as they lack standing to assert any or all of the claims alleged in the Complaint.

SEVENTEENTH DEFENSE

(Lack of Jurisdiction)

Some or all of Plaintiffs' state-law claims cannot be brought against TRCLP and/or RMC for a lack of jurisdiction. For instance, the laws of the states cited in Count II of the Complaint are not intended to, and do not, apply to conduct occurring outside of those states, and Plaintiffs' Complaint does not include any Plaintiff from the States of Alaska, Arizona, District of Columbia, Hawaii, Idaho, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Utah, Vermont, Virginia, West Virginia, Wisconsin, or Wyoming.

Many of the state laws allegedly giving rise to Plaintiffs' claims do not apply because the alleged conduct did not occur within or substantially affect the citizens or commerce of the respective states, or because TRCLP and/or RMC had no specific intent to impact the commerce

of those states. As a result, the application of those state laws to TRCLP's and/or RMC's conduct would violate the Due Process Clauses and Commerce Clause of the U.S. Constitution, the principle of federalism, and the constitutions and laws of the respective states at issue.

To the extent that the Complaint seeks to assert claims or obtain relief on behalf of multifamily renters located outside of the jurisdictions governed by those laws, those claims are barred as improper assertions of extraterritorial jurisdiction and any effort to enforce those laws as to residents of other states would violate the Due Process Clause and the Commerce Clause of the U.S. Constitution and various state laws and constitutions.

EIGHTEENTH DEFENSE

(No Private Right of Action)

Some of Plaintiffs' state-law claims are barred, in whole or in part, to the extent Plaintiffs seek damages under state laws that do not permit recovery of damages by private plaintiffs.

NINETEENTH DEFENSE

(Failure to Comply with State Law Notice)

Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs failed to comply with the notice requirements under various state laws.

TWENTIETH DEFENSE

(Justified & Pro-Competitive Conduct)

Some or all of Plaintiffs' claims are barred because all of TRCLP's and RMC's conduct challenged by Plaintiffs was lawful, fair, non-deceptive, expressly authorized by law, justified, and pro-competitive; it constituted a bona fide business practice consistent with industry practices and was carried out in furtherance of legitimate business interests; and it was an essential part of TRCLP's and/or RMC's lawful business operations.

TWENTY-FIRST DEFENSE

(State Law Class Action Limitations)

Some or all of the respective state-law claims at issue cannot be, and were not intended to be, applied in the class-action context.

TWENTY-SECOND DEFENSE

(Antitrust Standing)

Plaintiffs' claims are barred, in whole or in part, because they lack antitrust standing and have not suffered any injury in fact and/or any injury cognizable under the antitrust laws.

TWENTY-THIRD DEFENSE

(State-Law Bars)

Plaintiffs' state-law claims are barred, in whole or in part, to the extent they seek recovery under laws that do not permit recovery of damages by private plaintiffs.

TWENTY-FOURTH DEFENSE

(Incorporating Other Defendants' Defenses)

TRCLP and RMC adopt and incorporate by reference any and all other defenses asserted by any other Defendant to the extent that the defense would apply to TRCLP and/or RMC.

TWENTY-FIFTH DEFENSE

(Right to Assert Other Defenses)

TRCLP and RMC reserve the right to assert other defenses as this action proceeds up to and including the time of trial.

Dated: February 5, 2024

Respectfully Submitted,

WALDEN MACHT & HARAN LLP

By: /s/ Georgia Winston

Georgia Winston (NY: 3996840)

Admitted Pro Hac Vice

250 Vesey Street, 27th Floor

New York, NY 10281

Tel: (212) 335-2972

gwinston@wmhlaw.com

JACKSON LEWIS, P.C.

Jennifer S. Rusie

611 Commerce Street, Suite 2803

Nashville, TN 37203

(615) 656-1664

Jennifer.Rusie@jacksonlewis.com

*Attorneys for The Related Companies, L.P.
and Related Management Company L.P.*

CERTIFICATE OF SERVICE

Pursuant to Paragraph 9 of the Courts's Practice and Procedures Notice entered April 19, 2023 (ECF No. 2), I certify that counsel of record who are registered for CM/ECF Filing will be served electronically with this filing on February 5, 2024.

DATE: February 5, 2024

/s/ Georgia Winston
Georgia Winston